

MEMO ENDORSED

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April 16, 2020

Hon. Lewis A. Kaplan
United States District Judge
Southern District of New York
US Courthouse
500 Pearl Street
New York, NY 10007

Via ECF and email to Andrew.Mohan@nysd.uscourts.gov

Re: United States v. Delgado and Cuevas

19 Cr. 817 (LAK)

Dear Judge Kaplan:

I represent Daniel Cuevas, one of the defendants in the above-captioned matter, pursuant to the Criminal Justice Act. This matter is scheduled for a status conference on April. 22, 2020.

Your Honor's Court Deputy has contacted the parties concerning the conference and we have conferred among ourselves. Government counsel (AUSA Jacob Warren), counsel for defendant Delgado (Daniel Parker) and I are unanimous in requesting that the conference be adjourned for approximately 60 days. This time is necessary so that we may be able to speak with our clients in these challenging circumstances and continue to pursue a resolution of the case without a trial. I am authorized to state that both Mr. Parker and I waive speedy trial time on behalf of our respective clients until the adjourned date.

If this request meets with the Court's approval, kindly "so order" this letter or have Chambers contact us if there are any questions or instructions.

Very truly yours,

Bennett M. Epstein (electronic signature)

Bennett M. Epstein

Conference adjourned to 6/17/2020 at noon. Time excluded under Speedy Trial Act to and including that date. Interests of justice served thereby outweigh interests of defendant and public in speedy trial in light of pandemic and limitations on ability of counsel to consult with his client. SO ORDERED. 4/17/2020

